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July 8, 1997

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

VIA HAND DELIVERY

Mr. William F. Caton Acting Secretary Federal Communications Commission Room 222 1919 M Street, N.W. Washington, D.C. 20554

MM Docket Nos. 91-221/87-8, 94-150, 92-51 and 87-154

Dear Mr. Caton:

Re:

This letter is written on behalf of KS Family Television, Inc. and GOCOM License, L.L.C. This report is submitted in response to the Commission's Public Notice of June 17, 1997 (DA 97-1246) requiring parties to existing television local marketing agreements ("LMA") to provide certain factual information regarding the terms and characteristics of those agreements. This letter is being submitted in an original and four copies pursuant to the instructions of the Commission.

The response to the nine numbered questions of the Commission are as follows:

- 1. Station WYDO-TV, Channel 14, Greenville, North Carolina, licensed to KS Family Television, Inc. is the subject of an LMA with GOCOM License, L.L.C., successor in interest to Local Television Associates, Inc. as the former licensee of WFXI-TV, Channel 8, New Bern, North Carolina.
- 2. The market in which WYDO-TV, the brokered station, and WFXI-TV, the brokering station, is the Greenville-New Bern-Washington, North Carolina Neilsen Designated Market area, which is number 105 in the country.

3. The brokering and brokered stations have a *de minimus* amount of Grade A overlap of their predicted signal contours. The extent of the Grade B overlap, as computed by Mullaney Engineering, Inc., for the stations is as follows:

| Area | <u>Population</u> | Land Area |
|---------------------------|-------------------|-----------|
| | (1990) Census | (sq. km) |
| WFXI Grade B Contour | 288,919 | 8,622 |
| WYDO Grade B Contour | 450,633 | 10,414 |
| Grade B Overlap | 75,212 | 3,148 |
| Overlap Area/WFXI Grade B | 26.0% | 36.5% |
| Overlap Area/WYDO Grade B | 16.7% | 30.2% |

- 4. The LMA was initially entered into on November 3, 1992 between KS Family Television, Inc. and the former licensee of WFXI-TV, Local Television Associates, Inc.
- 5. The initial term was for two years and 10 days from the date of the agreement. On May 27, 1994, the same parties entered into a modification of the November 3, 1992 agreement and extended the term of the agreement until July 1, 2001. In 1995, WFXI-TV was sold to GOCOM License, L.L.C. which assumed the obligations of Local Television Associates, Inc. under the LMA. On May 23, 1996, an application was filed with the Commission for the assignment of license of WYDO-TV from KS Family Television, Inc. to GOCOM with a request that WYDO-TV be permitted to operate as a satellite of WFXI-TV. That application is now pending at the Commission (BALCT-960523IB). Upon grant of the assignment of the license of WYDO-TV to GOCOM, the LMA will cease.
- 6. WYDO-TV's weekly broadcast hours that are programmed by WFXI-TV, pursuant to the LMA, are 112 out of the 168-hour broadcast week. Approximately 50-56 hours are separately programmed by KS Family Television, Inc., depending upon commercial interest in the hours and the need for station repair and maintenance.

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- 7. Both WYDO-TV and WFXI-TV are affiliated with the Fox Television Network.
- 8. The reported Neilsen all-day audience household share (9 a.m. through midnight) for WFXI-TV and WYDO-TV during the last three rating periods is as follows:

| | <u>WFXI-TV</u> | WYDO-TV |
|---------------|----------------|---------|
| May 1997 | 4.0 | 3.0 |
| February 1997 | 4.0 | 3.0 |
| November 1996 | 4.0 | 2.0 |

9. WYDO -TV was put on the air approximately July 1992 by KS Family Television, Inc. and operated independently for several months until the programming agreement with Local Television Associates, Inc. was entered into on November 3, 1992. The benefits to the public that have been associated with brokering of time on WYDO-TV by WFXI-TV have been described in BALCT-960523IB, those same benefits will be realized and extended upon grant of the license of WYDO-TV to GOCOM as described further in the pending application.

If there is any additional information with respect to this arrangement which the Commission desires, please contact the undersigned counsel.

Sincerely

Joel H. Levy

ce: Alan Baughcum (MMB, FCC, Rm. 531, 2000 M St.)